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TRANSMITTAL LETTER
ET - Docket 93-7

April 14, 1995

DOCKET FILE COPY ORIGINAL

Mr William F Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20544

Dear Mr. Caton,

Please include the attached letter and materials as comment on the ET Docket 93-7 or **"Compatibility between Cable Systems & Consumer Electronic Equipment."**

Please notify IrDA of any notices of proposed rulemaking or pertinent communications in relation to these matters.

Infrared Data Association - IrDA
PO Box 3883
Walnut Creek, CA 94598

Thank you,

A handwritten signature in black ink, appearing to read "John LaRoche", is written over a horizontal line.

John LaRoche, IrDA Executive Director 510-943-6546

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April 14, 1995

Mr. Richard Smith
Chief, Office of Engineering & Technology
Federal Communications Commission
1919 M Street, NW
Washington, DC 20544

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Dear Mr. Smith,

The Infrared Data Association (IrDA) has recently become aware of **ET Docket 93-7** or **"Compatibility between Cable Systems & Consumer Electronic Equipment,"** and also of an ex parte filing submitted by Walt Ciciora of the NCTA to yourself which refers to an issue entitled **"The Command Set Problem."** In this document I find further references to several methods for passing infrared (IR) signals and/or data from the consumer via a path through or around a television (TV), VCR or piece of tuner based consumer electronics equipment to a device referred to as a "Decoder Interface Module" or "Plug-In Module." I also find the reference to IrDA and our successful development of an open standard for communicating data via infrared (IR) signals over a variety of computing and telephony devices and systems.

The intent of this letter is to introduce IrDA and emphasize our efforts over the last two years to standardize cordless infrared data links, plus to express IrDA's interest in the development of an **open path for infrared data connections** from the consumer to the cable or telco decoder interface module. I and the IrDA's Board of Directors are intrigued and interested in how any industry agreement on infrared or FCC rulemaking will affect the use of open standards for communicating data via infrared signaling.

IrDA's member companies number over 100 and represent many of the premier computer, communications, consumer electronics, software and semiconductor component manufacturers in the world. Our simple goal is to create standards for open, low cost, point-to-point, high speed infrared data transfer connections to and

from one mobile device (Examples: notebook PC or PDA/organizer) to another mobile or stationary device (Examples: desktop PC, printer, telephone, etc).

IrDA's primary focus is to establish open standards which promotes a solid foundation for **non-interference and interoperability between all manufacturers'** hardware platforms and software operating systems within the personal computer or telecommunications industries.

Compliance to the IrDA specification assures that a data link connection is established. **IrDA does NOT define command sets**, application codes, drivers or data formats. Member companies must develop these initiatives on their own or with other interested parties outside IrDA's official standards efforts.

We are aware of four methods mentioned for resolution of the command set problem; IR By-Pass, IR Pass Through, IR Twin or Addressable ASCII. IrDA's interest is in ensuring that whatever resolution is chosen, that the path for passing data from the consumer to the decoder interface module will allow for free and open use of the infrared connection from the consumer to the decoder interface module.

An IR Pass Through type model would allow for a version of the IrDA's standard to be a potential candidate for use as an IR port to the decoder interface module. This would represent an encouraging opportunity to prevent interference (via signal detection & avoidance protocols). It also would also provide a full potential range of information to pass to new and often yet unforeseen service applications. Although one directional signaling is important and indeed most relevant, the IrDA's standard also deals with two way signaling (half duplex) and this usage model is considered important for many consumer services of the future.

The IrDA has an open and fully accessible membership and operational paradigm. We want to ensure compliance to our specification in order to promote interoperability. The methods for accomplishing this goal are to allow for self-compliance testing by the company producing an IrDA compliant system. In our model, if device or system manufacturers implement all required pieces of the specification, they may then claim compliance and/or use the IrDA "Beaming IR" trademark. In a way, this would be the IrDA equivalent of claiming "Cable Ready."


The IrDA maintains the right and responsibility of enforcement on product claims of IrDA specification compliance. This allows IrDA to make sure trademarked products on the market provide the complete foundation for an IrDA functional cordless data link and reassure consumers of many future useful applications. IrDA guarantees only the IR connection and the market then determines whose products work better, are more cost effective, access more compelling applications or provide the most useful features. This is an achievable way to foster utility and interoperability.

Again, the IrDA believes that there must be an open path from consumer to service providers. Similarly, the use of IR from the consumer to the decoder interface must be unencumbered even if it passes through a TV or VCR. Ultimately, this provides the consumer with the widest array of products and services at the lowest possible costs.

In conclusion, I would like to thank you for taking the time to consider IrDA's position and ask that we be kept informed of any proposals for rulemaking considered in this area. John LaRoche, IrDA's Executive Director has and will attend meetings of the EIA's & NCTA's Joint Engineering Committee which addresses these matters. He will make known our interests to that group as well.

Additional information on IrDA and its members and standards are enclosed. Feel free to contact me at 408-970-5675 for any clarifications I may offer. I or IrDA members are available to meet with you if beneficial to you.

Very Sincerely,



Michael Watson
President - Infrared Data Association
For the IrDA Board of Directors

John LaRoche
Executive Administrator - Infrared Data Association

cc: Alan Stillwell, FCC Policy Analyst, Office of Engineering & Technology



PRESS RELEASE

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Contact - John LaRoche
510-943-6546

The Infrared Data Association (IrDA)

IrDA Standards Group to Publish Higher Speed Extensions and Application Support

Walnut Creek, California - IrDA announces new additions to its data link standard will be published in June 1995. This further assures a rich foundation for useful cross platform infrared connected applications to be available by year end. **Highlighted are communications port support, telephony support and 1Mb/4Mb high speed extensions** (backward compatible to the 9600 - 115 Kb speeds). As a wire/cable replacement feature, IrDA provides cordless convenience for mobile computer users. It promises to be a worldwide accomplishment, with international mobile computer system providers expected to embed full IrDA functionality in most future product models (while adapters allow adding the IrDA feature to present computers, printers and telephones as well.) Consumers of the future will expect their new mobile computers to provide quick dependable data exchanges between a host of electronic devices regardless of product types or brand names.

IrDA's wireless "point and beam" data transfer is simple yet compelling. As a cross platform infrared serial data link, the standard features low power consumption with a range of at least three feet (up to ten feet.) Applications will exchange data files between many computer and communication devices such as desktop and notebook PCs, printers, fax machines, network nodes, data modems, telephones, automated tellers, handheld mobile units (PDAs), electronic organizers and many others. The higher speed extensions to the IrDA standard was recognized by Comdex'94/Byte Magazine as a "significant technology" award finalist.

Products Designed to the IrDA Standard Come to Market

Recent industry shows such as CeBIT '95 and Spring Comdex '95 saw many products implementing infrared (IR) connectivity. Market leaders have either announced or released products with infrared features based on IrDA functionality. These products include components, adapters, printers, PCs and notebook(*) computers from Actisys (adapter), Acer (*Acernote 950), Adaptec (adapter), Alps, AMP (adapter), Connexus, Crystal Semiconductor, Digital Equipment Corp (*HiNote Ultra), Extended Systems (JetEye), Gateway 2000 (*Liberty), Genoa Technology, IBM (*Thinkpad-73 notebooks), Infratec (adapter), Intel, Irvine Sensors, Hewlett Packard (*Omnibook & LaserJet 5P/5MP printers), Microsoft (Windows95), National Semiconductor, Nokia Mobile Phones (cellular phone adapter), Norand (*PenKey handheld), Olivetti, O'Neil (beltheld printer), Puma (TranXit software), Sharp Electronics (*8700 notebook & Zaurus handheld), Siemens, Standard Microsystems, Sun Microsystems (Voyager), TEMIC, Texas Instruments (*Travelmate 2000) and Tulip Computer.

IrDA Trademark, Implementation Resource List and Standards Documents

IrDA has established a trademark licensing program for products designed to provide IR link interoperability across brand names based on full compliance to the IrDA Standard. Licensees' products so validated may use the IrDA **"Beaming IR" trademark on the compliant product or its packaging** as well as in advertisement related to that product. The IrDA Standard's mandated physical and protocol levels (Serial Infrared SIR, Infrared Link Access Protocol IrLAP, Link Management Protocol IrLMP) were formally adopted and published in mid 1994 (one year after IrDA's commencement.) Non-members may obtain a free list of components & resources, or indeed purchase a copy of the complete specifications for a \$500 fee.

Infrared Data Association's User Convenience Focus, Low Cost and Global Distribution

IrDA functionality is predicted to be ubiquitous for mobile computer users in tomorrow's home and workplace. The installed base of PCs, printers and phones are upgradable. Future PC bus architectures will allow many connected devices to be accessed via a single IrDA access point. The average user, familiar with operating a TV infrared remote control, should find this "point and beam" method of data exchange between IrDA devices to be straightforward and intuitive. Widespread adoption is being strongly compelled by the low cost of implementing this convenience feature in new products (manufacturing costs are only several dollars per device). Few USA, European or other international regulatory constraints exist and interference problems are minimal. Manufacturers can ship IrDA enabled products globally without constraints and IrDA functional devices will be quite useable by international travelers wherever in the world their travels may take them.

Examples of consumer applications expected in the near future include quickly printing a document, synchronizing electronic phonebooks and schedulers, exchanging business cards between handheld PCs, fax or e-mail directly from a notebook PC through a public phone, or storing bank records from ATM machines by making a simple, walk up and point IR connection. Industrial and service data collection applications will expand dramatically utilizing mobile IrDA enabled devices to improve control, documentation and docking procedures in the workplace. The future also promises integrated devices that access the home's entertainment, security and automation/environment systems.

Infrared Data Association's Membership, Meetings and Communications

IrDA has member firms representing over 100 industry leaders in computer and telecommunication hardware, software and component sectors. IrDA's international membership includes industry leaders such as those key contributors that authored the IrDA Standard; led by Hewlett Packard and IBM with strong contributions from Apple Computer, Crystal Semiconductor, Intel, Microsoft, Sharp, TEMIC and others. IrDA holds general technical and marketing meetings every two months. Working committees heavily use email & FTP on Internet. Over five hundred individuals' email addresses are registered on the association's general communication reflector which provides a broadcast of participant comments/contributions and IrDA announcements to all members.

Infrared Data Association Information

◇ Mail: IrDA, PO Box 3883, Walnut Creek, California 94598

◇ Email: irda@netcom.com ◇ Phone: 510-943-6546 ◇ Fax: 510-943-5600

IrDA Membership Roster 1995

Actisys	Extended Systems	Marquette Electronics	Puma Technology
Adaptec	Farallon Computing	Matsushita/Panasonic	Questor Software
Adv'd Micro Devices	Farpoint Comm	Megasoft	ROHM
Alps Electronics	Forte Comm	Microsoft	Samsung
Alroma Scientific	Fujitsu	Mitsubishi	Sanyo
AMP	Gateway 2000	Motorola	Scientific Techn
Apple Computer	Gemplus	MPR Teltech	Seiko
AST Research	General Instruments	National Semi	Sharp Electronics
AT&T - AT&T/GIS	General Magic	NEC	Siemens
British Telecom	Genoa Technology	Nokia Mobile Phones	Sony
Brother Int'l	Geoworks	Norand	Standard Micro Corp
Canon	GES Singapore	Northern Telecom	Stenograph
Casio Computer	Hewlett Packard	Novell	Sumitomo Electric
Cirrus Logic/Crystal	Hitachi	NTT/Nippon Tel&Tel	Sun Microsystems
Citizen	IBM	Okaya Systemware	SystemSoft Corp
Compaq Computer	ICL Personal Systems	OKI Electric	TDK/Silicon Systems
Compression Labs	I I Stanley	Olivetti	TeleQual
Connexus	Infratec Datentechnik	O'Neil Software	TEMIC/Daimler Benz
DaeWoo Telecom	Intel	Open Interface	Texas Instruments
Dell Computer	Inventec	Parallax Research	Timex
Digital Equipm't Corp	Irvine Sensors	Philips	Toshiba
DOWA	ITT Cannon	Photonics	Traveling Software
Eastman Kodak	K&M Electronics	Plantronics	Unitrode
ECI France	Lexmark Int'l	Polaroid	VLSI Technology
Ericsson	Logitech	Protell Comm	Winbond
Executone	LXE	Psion	Xerox

IrDA Member Firms on the Board of Directors

Adaptec
Advanced Micro Devices
AMP
Apple Computer
Canon
Cirrus Logic/Crystal Semi
Compaq Computer
Extended Systems
Genoa Technology
Hewlett Packard
IBM
Intel
ITT Cannon
Matsushita/Panasonic
Microsoft
Motorola
National Semiconductor
NEC
Nokia Mobile Phones
Northern Telecom
NTT/Nippon Tel&Tel
Okaya Systemware
Philips
Photonics
Sharp Electronics
Sony
Sun Microsystems
TEMIC
VLSI Technology

Second Year IrDA Leadership (as of April 1995)

Mike Watson, President

TEMIC/Daimler Benz 408-970-5675

Wassef Haroun, Vice President

Microsoft 206-882-8080

Steven Harris, Secretary

Cirrus Logic/Crystal 512-445-7222

John LaRoche, Treasurer & Exec Dir

IrDA 510-943-6546

Peter Hortensius, Technical Chair

IBM 914-784-7779

Stuart Williams, Technical CoChair

Hewlett Packard 44-272-228285

Hiroshi Uno, Technical CoChair

Sharp Electronics 81-7436-5-2466

Michael Leclerc, Marketing Chair

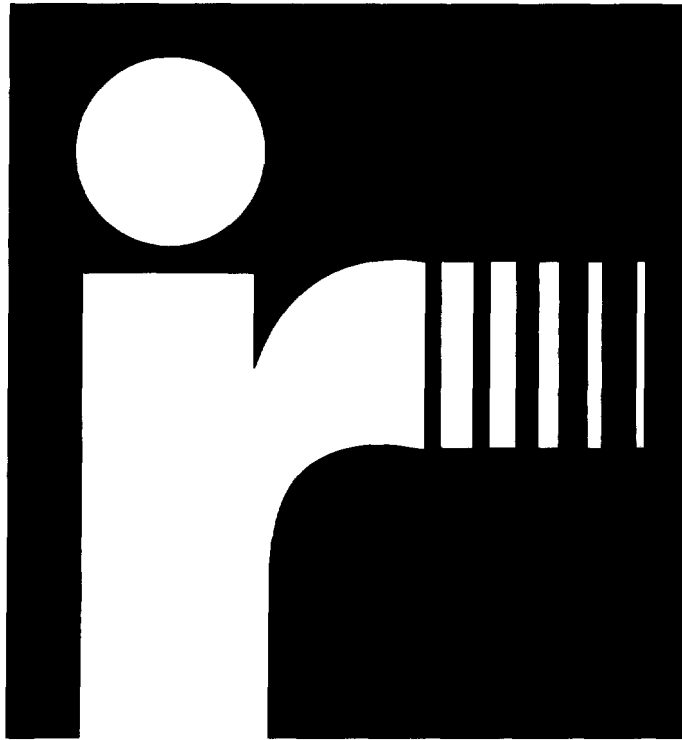
Hewlett Packard 916-785-4289

Len Magnuson, Marketing CoChair

Intel 503-264-2269

Robert Stuart, Marketing CoChair

Sharp 206-834-8948



The use of the above illustrated Infrared Data Association (IrDA) mark affirms that the referenced product or device complies with IrDA specifications.

IrDA member and non-member licensees must obtain authorization from IrDA to use the mark in relation to a product.